May 24, 2021

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Subject: Ten West Link and Cielo Azul
DCR Transmission, L.L.C.
Ten Year Plan 2021
E-99999A-21-0009

To Whom It May Concern:

Pursuant to A.R.S. §40-360.02 (A) and (C), DCR Transmission, L.L.C. ("DCRT") hereby submits to the Arizona Corporation Commission ("ACC") its revised Ten Year Plan filing for the year 2021 for its Ten West Link project ("Ten West Link") and for the Cielo Azul Switchyard ("Cielo Azul" or "Switchyard"). The information requirements associated with A.R.S. §40-360.02 (C) are included as Appendix A and Appendix C to this filing.

Ten West Link, formerly referred to as the Delaney-Colorado River Transmission Project, is an approximately 125-mile long, 500 kV overhead transmission connection between Arizona Public Service Company's ("APS") Delaney substation located in Tonopah, Arizona, and Southern California Edison Company's ("SCE") Colorado River substation located in Riverside County, California, west of the city of Blythe. A map of the Approved Project is attached as Appendix B. Following the successful completion in November 2019 of a NEPA process led by the Bureau of Land Management ("BLM"), DCRT filed its Application for a Certificate of Environmental Compatibility ("CEC") from the Arizona Corporation Commission ("ACC") on December 9, 2019, which was approved by the Arizona Corporation Commission in Decision No. 77587 (March 31, 2020).

In accordance with the Southern California Edison Company ("SCE") and Arizona Public Service Company ("APS") requirements for wire-to-wire interconnections, DCRT is working with the two interconnecting transmission companies to interconnect and integrate the Ten West Project into the existing bulk transmission network. Long lead-time equipment associated with the interconnection of Ten West to the Delaney and Colorado River substations has been ordered, the Interconnection Agreement ("IA") with APS was executed on June 2, 2020, and the IA with SCE is expected to be executed in the second quarter of 2021. In addition to working with the two interconnecting utilities, DCRT has prepared and submitted the Western Electricity Coordinating Council's ("WECC") Comprehensive Progress Report and is engaged in the WECC Path Rating Process. The Project is being regularly reviewed and discussed at regional planning

forums such as WestConnect, the Southwest Area Subregional Transmission Planning Group ("SWAT") and SWAT's various subcommittees. The Project has been previously reviewed by the ACC as part of its 2014 (8th), 2016 (9th), and 2018 (10th) Biennial Transmission Assessments.

As DCRT will be a Participating Transmission Owner ("PTO"), as defined by applicable Federal Energy Regulatory Commission ("FERC") rules and regulations, it has the obligation to provide non-discriminatory access to all generation projects proposing to interconnect to Ten West Link or to use the capacity of the Project. The Atlas Solar project, a proposed 3,200 MW solar plus energy storage project, ("Atlas Solar" or "Atlas Generation") executed a FERC-filed Large Generation Interconnection Agreement ("LGIA") to connect Atlas Generation to Ten West Link. The proposed Atlas Project will be located in La Paz County, Arizona ("County"), on land recently transferred to the County by the federal government. The Switchyard proposed herein will be constructed solely to facilitate the interconnection of Atlas Solar and other proposed renewable generation and energy storage projects in the area to the bulk high-voltage transmission grid via Ten West Link. A map of the Switchyard proposed herein is attached as Appendix D.

This filing is intended to respond to the requirements of A.R.S. §40-360.02 (A) and (C) as they might apply to Ten West Link, the new proposed Cielo Azul Switchyard, and related electric facilities currently under study. Depending on both the timing and nature of future developments, DCRT may have occasion to file an additional amendment to this Ten Year Plan for 2021.

Additional information on Ten West Link can be found at www.tenwestlink.com

Please direct any questions that may arise from this report to either Ali Amirali at (916)740-0990 (aamirali@starwood.com) or myself at (713)569-8995 (jcrew@starwood.com).

Sincerely,

/s/ Jason Crew

Jason Crew
Project Executive
DCR Transmission, L.L.C.

Appendices (4)
cc: Elijah Abinah, Utilities Division, Arizona Corporation Commission
Robin Mitchell, Legal Division, Arizona Corporation Commission
Maureen Scott, Legal Division, Arizona Corporation Commission
Ali Amirali; Starwood Energy Group Global, Inc.
Meghan H. Grabel, Esq., Osborn Maledon, P.A.

APPENDIX "A"

Ten West Link
A.R.S. §40-360.02 (C) Information Requirements

Appendix "A"
Information Requirements Pursuant to A.R.S. §40-360.02 (C)

40-360.02 (C) (1)

The size and proposed route of any transmission lines or location of each plant proposed to be constructed.

Ten West Link involves the construction of a proposed 500 kV transmission line between the APS Delaney Substation, located in Tonopah, Arizona, and the SCE Colorado River Substation, located just west of the City of Blythe in Riverside County, California. The BLM Selected Route for the project spans approximately 125 miles, the vast majority of which is in Arizona.

For the BLM's Selected Alternative, the route segments, the land category crossed (in miles), and the right-of-way ("ROW") land crossed is presented in Table 1-1. The route taken by the BLM Selected Alternative avoids the Kofa National Wildlife Refuge, population centers in Quartzite, Arizona and Blythe, California, the Blythe airport, the visitor center and camping area in La Paz County, Arizona, and cultural and biologically sensitive areas. Also, wherever possible, the route of the BLM Selected Alternative also uses the Department of Energy's ("DOE") Energy Corridor along Interstate 10 ("I-10") and parallels SCE's existing Devers-Palo Verde ("DPV") 500 kV transmission line. The DOE Energy Corridors and BLM-designated utility corridors are one mile in width, and the use of these corridors for Ten West Link would be considered a compatible use within these corridors. DCRT would require a 200-foot ROW for the transmission line and proposes to use the existing access roads currently used to maintain SCE's existing DPV transmission line along the portions of the Project that are aligned with DPV. Ten West Link would also include the construction of a series compensation station in the middle of the route. Refer to Appendix B for the Project map.

Table 1-1. Land Categories and ROW Land Crossings of the BLM Preferred Alternative

Route Segment	Length of Segment	Land Category Crossed (in Miles)	200' ROW Land Crossings (in Acres)
BLM Proposed Action	124.9 miles	BLM: 79.4 USFWS 0.0 Reclamation 1.7 DOD 0.4 State 18.8 Private 24.6 Indian Land 0.0	Bureau of Land Management 1,922 Bureau of Reclamation 41 Department of Defense 5 State (AZ) 427 Private 635 **TOTAL 3,030** * Assuming a uniform 200-foot ROW.

40-360.02 (C) (2)

The purpose to be served by each proposed transmission line or plant

The purpose of Ten West Link is to provide additional high-voltage electrical transmission infrastructure to increase reliability of energy supply, to improve transmission system economics and to facilitate the interconnection and integration of new and existing renewable resources. The increase in supply enhances competition among energy suppliers, which has historically reduced energy costs to customers. Ten West Link will have the capability to transmit 2,700 megawatts ("MW") of electric supply, and the increase transfer capacity afforded by this project will enable cost-effective energy dispatch in the southwestern US. During the 2013-2014 Transmission Planning Process, the CAISO justified the need for Ten West Link based on the benefits associated with enhancing the high-voltage transmission path between the Delaney Substation and the Colorado River Substation. In additional to providing economic benefits, Ten West Link will also:

- Enhance system efficiency of the transmission network and improve system economics by increasing the system's capability to deliver energy;
- Increasing the transfer capacity of the East of River ("EOR") and West of River ("WOR") transmission paths;
- Reduce transmission system losses;
- Respond to policy preference for enhanced access to low-cost, environmentally friendly energy generation sources, enabling load serving entities to use a more diverse, cost-effective set of energy resources to serve electrical demand;
- Facilitate the development and efficient interconnection of new renewable energy resources along with energy storage facilities to the bulk transmission grid and help deliver energy produced at these facilities to the desired load centers in Arizona and California;
- Improve regional collaboration by increasing the efficient and increased sharing of generation resources between the two states, thereby enhancing operational flexibility;
- Enhance operational flexibility by creating a diverse transmission network that will serve the two states;
- Strengthen regional transmission grid and improve transmission system reliability under normal and emergency conditions;

- Reduce grid congestion and transmission system losses;
- Enhance participation in the Energy Imbalance Market ("EIM") and the potential Extended Day-Ahead Market ("EDAM");
- Conserve resources by using already developed transmission or utility corridors wherever possible, thereby minimizing visual, environmental, cultural, and other impacts, while maximizing the use of existing access roads and infrastructure; and
- Promote regional economic development by creating new jobs, as well as indirect economic benefits such as secondary spending by those employed by the project, and property tax revenues.

40-360.02 (C) (3)

The estimated date by which each transmission line or plant will be in operation.

Based on current planning, the Project is estimated to be placed in service by the end of 2022.

40-360.02 (C) (4)

The average and maximum power output measured in megawatts of each plant to be installed

Not applicable

40-360.02 (C) (5)

The expected capacity factor for each proposed plant

Not applicable

40-360.02 (C) (6)

The type of fuel to be used for each proposed plant

Not applicable

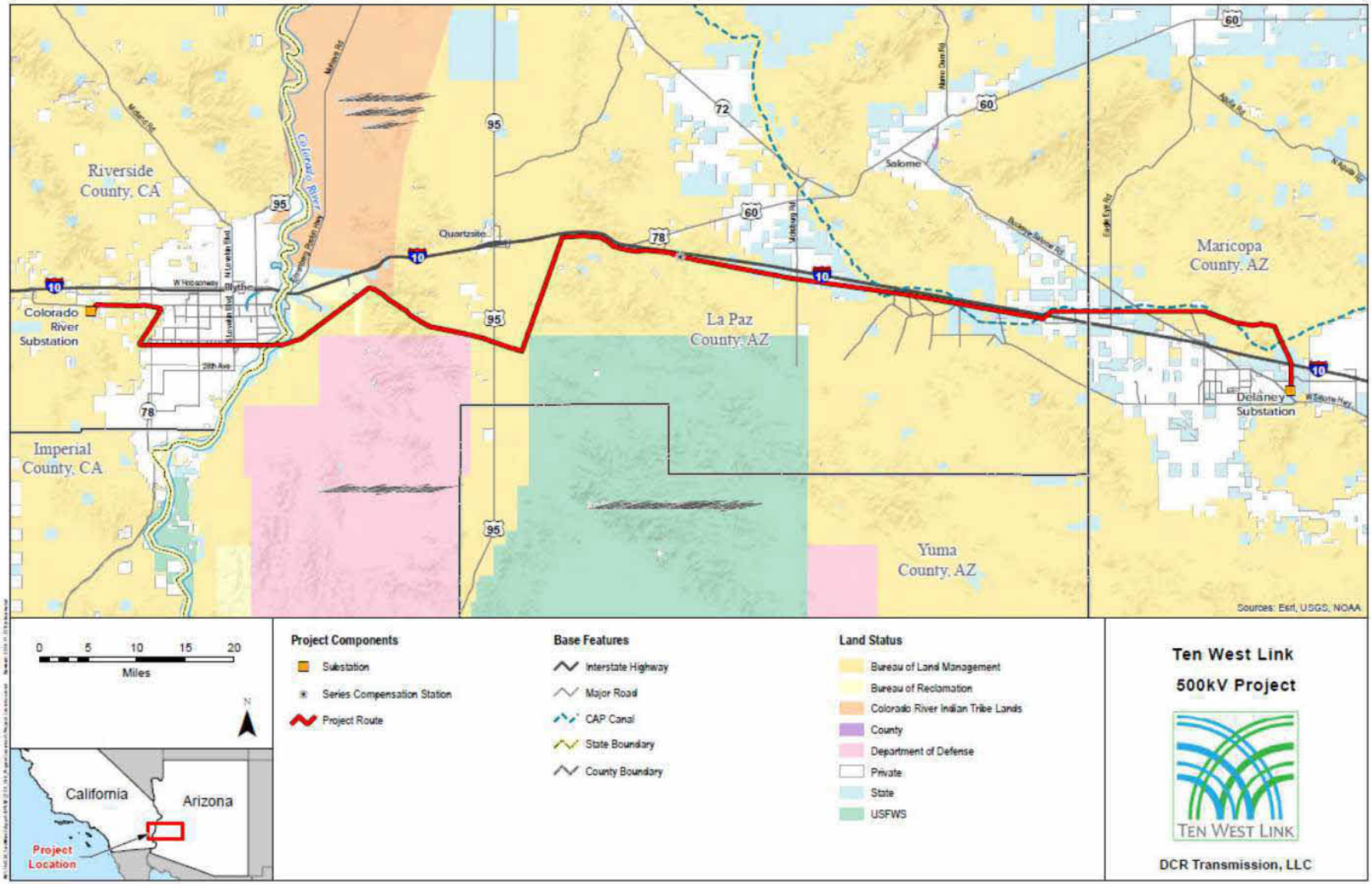
40-360.02 (C) (7)

The plans for any new facilities shall include a power flow and stability analysis report showing the effect on the current Arizona electric transmission system. Transmission owners shall provide the technical reports, analysis, or basis for projects that are included for serving customer load growth in their territories.

As part of the wire-to-wire interconnection process, SCE and APS, the two interconnecting transmission owners for Ten West Link, have performed power flow studies, stability studies, dynamic system modeling and short-circuit studies for the Project. The results of the studies have clearly indicated that Ten West will not have any impacts on the bulk transmission network.

APPENDIX “B”

Ten West Link
Approved Project Route Map


Riverside
County, CA
Imperial
County, CA
La Paz
County, AZ
Yuma
County, AZ
Maricopa
County, AZ
Colorado
River
Substation
Delaney
Substation
Quartzsite
Salome
Blythe
Colorado River
Sources: Esri, USGS, NOAA
0 5 10 15 20
Miles
N
California
Arizona
Project
Location
Project Components
Substation
Series Compensation Station
Project Route
Base Features
Interstate Highway
Major Road
CAP Canal
State Boundary
County Boundary
Land Status
Bureau of Land Management
Bureau of Reclamation
Colorado River Indian Tribe Lands
County
Department of Defense
Private
State
USFWS
Ten West Link
500kV Project
TEN WEST LINK
DCR Transmission, LLC

APPENDIX "C"

Cielo Azul Switchyard
A.R.S. §40-360.02 (C) Information Requirements

Appendix "C"
Information Requirements Pursuant to A.R.S. §40-360.02 (C)

40-360.02 (C) (1)

The size and proposed route of any transmission lines or location of each plant proposed to be constructed.

The Switchyard will be located in La Paz County, Arizona, approximately 0.5 miles southeast of mile marker 58 on Interstate 10. DCRT has secured a right-of-way ("ROW") for a 55-acre site from La Paz County for the proposed project. Furthermore, the Switchyard will be located on the land transferred to La Paz County by the US federal government under the Dingell Act to promote economic development in the County. La Paz County has leased the bulk of this land to the developer of the Atlas Solar project for the construction of one of the largest solar plus energy storage projects in North America. As noted in the transmittal, the Atlas Solar project is a proposed 3,200 MW solar plus energy storage project which has executed a FERC-filed LGIA to interconnect with Ten West Link. The proposed Switchyard would facilitate this interconnection.

The Switchyard will consist of an approximately 36-acre six-bay, 500 kV switchyard arranged in a highly reliable breaker-and-a-half configuration along with a looped 500 kV connection to the Ten West Link. The connection with Ten West Link will be accomplished using steel monopoles on drilled piers. Cielo Azul will be fenced and contain equipment similar to that installed in other 500 kV switchyards and substations in Arizona. The ground surface within the fenced area of Cielo Azul will be covered with gravel and a retention pond will be included to manage stormwater runoff. The Switchyard will be unmanned except for inspection and maintenance activities.

Lacking a Federal nexus (such as funding or land), the Switchyard will not require evaluation under the National Environmental Policy Act (NEPA). Because Cielo Azul occurs within the 2,000-foot-wide study corridor that was used for the Ten West Link NEPA review, we anticipate that the robust environmental evaluation for the environmental impact statement completed for Ten West Link will suffice to secure the CEC for the Cielo Azul Project.

Table 1-1. Land Categories and ROW for the Switchyard

Land ROW	Area	Land Category (in acres)
Acquired from La Paz County	55 acres	100% owned by La Paz County

40-360.02 (C) (2)

The purpose to be served by each proposed transmission line or plant

The purpose of the Cielo Azul switchyard is to facilitate the interconnection of a large solar project (as well as future generation projects proposing to interconnect to the Ten West Link at

this location) to the bulk electric grid via the Ten West Link, thereby providing new, reliable, and cost-effective renewable energy to the southwest.

40-360.02 (C) (3)

The estimated date by which each transmission line or plant will be in operation.

Based on current planning, Cielo Azul is estimated to be placed in service by late 2022.

40-360.02 (C) (4)

The average and maximum power output measured in megawatts of each plant to be installed

Not applicable

40-360.02 (C) (5)

The expected capacity factor for each proposed plant

Not applicable

40-360.02 (C) (6)

The type of fuel to be used for each proposed plant

Not applicable

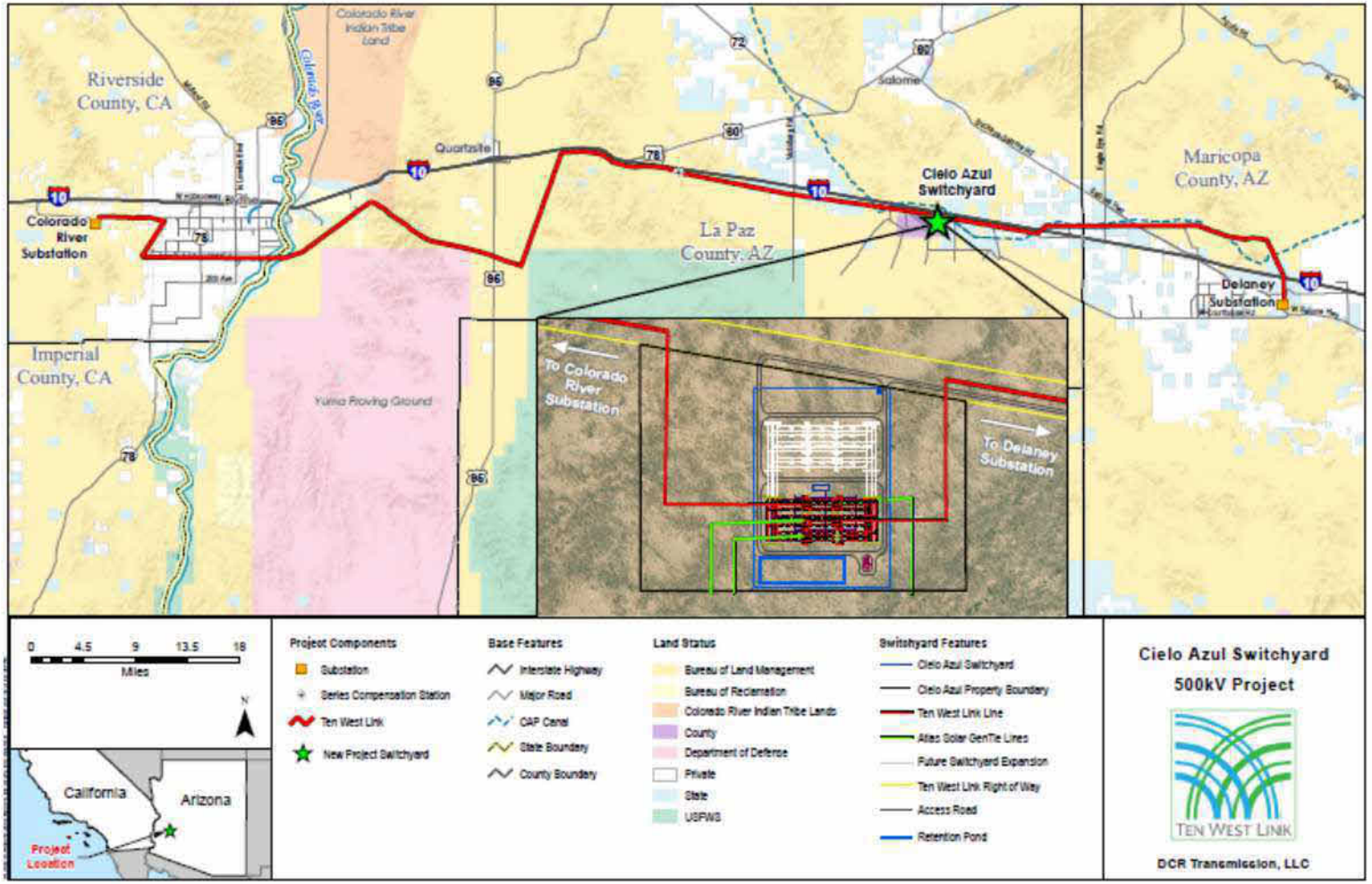
40-360.02 (C) (7)

The plans for any new facilities shall include a power flow and stability analysis report showing the effect on the current Arizona electric transmission system. Transmission owners shall provide the technical reports, analysis, or basis for projects that are included for serving customer load growth in their territories.

As Cielo Azul is just a point of interconnection for other new generation and transmission projects to the bulk transmission grid via Ten West Link, the construction of the Switchyard will not have any negative impacts on the bulk transmission network and will not require any downstream upgrades. As part of the Large Generator interconnection process, SCE and DCRT, the two interconnecting transmission owners for the Atlas Solar project, have performed power flow studies, stability studies, dynamic system modeling and short-circuit studies to identify the impacts of the new generation on the transmission network. The developers of the Atlas Solar project, as well as any other projects proposing to interconnect with Ten West Link via Cielo Azul, will have the responsibility to work with Arizona Public Service Company and all of the other impacted systems to identify and address any impacts on their respective transmission networks.

APPENDIX “D”

Cielo Azul Switchyard
Project Location and Layout


Riverside County, CA
Imperial County, CA
La Paz County, AZ
Maricopa County, AZ
Colorado River Indian Tribe Land
Yuma Proving Ground
Quartzsite
Salome
Colorado River Substation
Cielo Azul Switchyard
Delaney Substation
To Colorado River Substation
To Delaney Substation
0 4.5 9 13.5 18
Miles
California
Arizona
Project Location
Project Components
Substation
Series Compensation Station
Ten West Link
New Project Switchyard
Base Features
Interstate Highway
Major Road
CAP Canal
State Boundary
County Boundary
Land Status
Bureau of Land Management
Bureau of Reclamation
Colorado River Indian Tribe Lands
County
Department of Defense
Private
State
USFWS
Switchyard Features
Cielo Azul Switchyard
Cielo Azul Property Boundary
Ten West Link Line
Atlas Solar GenTie Lines
Future Switchyard Expansion
Ten West Link Right of Way
Access Road
Retention Pond
Cielo Azul Switchyard
500kV Project
TEN WEST LINK
DCR Transmission, LLC